

**ATTACHMENT T**

**Cover Sheet of OPR Investigation of  
John Raun – June 24, 1994**



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA DEPARTMENT OF CORRECTIONS  
Special Investigation Office

June 15, 1994

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Case Number: 94-F-032  
Report Prepared by: Mike Wolanin, Special Investigator  
Allegation: Sexual Harassment

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SUBJECT:

John Raun, CO II  
DOB: 12/04/63

COMPLAINANT / VICTIM:

Lisa Lambert, OB-6416  
DOB: 09/09/72

State Correctional Institution Cambridge Springs

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APPROVED:

Vaughn L. Davis  
Director  
Special Investigations Office

DISTRIBUTION:

Commissioner Lehman  
File

CONFIDENTIAL

**ATTACHMENT U**

**Deposition of Lisa Lambert**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

4 LISA MICHELLE LAMBERT, :  
5 PLAINTIFF, :  
6 - v - :  
7 SUPERINTENDENT WILLIAM : DOCKET CA 96-247 ERIE  
8 WOLFE, in his individual :  
9 capacity, :  
10 DEPUTY SUPERINTENDENT : DEPOSITION UPON  
11 CHARLES UTZ, in his :  
12 individual capacity, : ORAL EXAMINATION  
13 CAPTAIN KEITH BARTLETT, : LISA MICHELLE LAMBERT  
14 in his individual :  
15 capacity, :  
16 JOHN RAUN, in his :  
17 individual capacity, :  
18 and :  
19 JAMES EICHER, in his :  
20 individual capacity, :  
21 DEPUTY SUPERINTENDENT :  
22 VICTORIA KORMANIC, :  
23 in her individual :  
24 capacity, :  
DEFENDANTS. :  
- - -

JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY  
1-609-890-7033

1                   TRANSCRIPT of the stenographic notes of the  
2   proceedings taken in the above-entitled matter, as  
3   taken by PASQUALE F. CORVINE, a Certified Shorthand  
4   Reporter and Notary Public of the State of New Jersey,  
5   at the EDNA MAHAN CORRECTIONAL FACILITY FOR WOMEN,  
6   P.O. Box 4004, Clinton, New Jersey 08809-4004, on  
7   Thursday, July 22, 1999, commencing at 10:00 a.m.

8

9

A P P E A R A N C E S S

11

12                   PENNSYLVANIA INSTITUTIONAL LAW PROJECT  
13                   BY:     ANGUS R. LOVE, ESQ.  
14                   EXECUTIVE DIRECTOR  
15                   924 Cherry Street  
16                   Suite 523  
17                   Philadelphia, Pennsylvania 19107  
18                   ON BEHALF OF THE PLAINTIFF

16 MIKE FISHER, ESQ.  
17 ATTORNEY GENERAL  
18 BY: THOMAS F. HALLORAN, ESQ.  
19 SENIOR DEPUTY ATTORNEY GENERAL  
20 Commonwealth of Pennsylvania  
21 Office of the Attorney General  
Litigation Section  
6th Floor, Manor Complex  
564 Forbes Avenue  
Pittsburgh, Pennsylvania 15219  
ON BEHALF OF THE DEFENDANTS

22

23

24 JOHN F. TRAINOR, INC.  
BY: PASQUALE F. CORVINE  
CERTIFIED SHORTHAND REPORTER  
25 LICENSE NO.: XI00645

JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY  
1-609-890-7033

| 1  | WITNESS  | INDEX                              | 3  | LAMBERT   | 5 |
|----|--|------------------------------------|----|---|---|
| 2  | LISA MICHELLE LAMBERT                                  |                                    |    | 1 to rephrase it so you do understand it. Please make     |   |
| 3  | BY MR. HALLORAN  |                                    | 4  | 2 sure you answer my questions verbally. The court        |   |
| 4  |  |                                    |    | 3 reporter has to have a "yes" or "no" response or a      |   |
| 5  |  |                                    |    | 4 verbal response to take down.                           |   |
| 6  |  |                                    |    | 5 Are you under medication or are there any other         |   |
| 7  |  |                                    |    | 6 reasons you won't be truthful or you might not          |   |
| 8  |  |                                    |    | 7 understand my questions?                                |   |
| 9  |  |                                    |    | 8 A No. I'm not on any medication.                        |   |
| 10 |  |                                    |    | 9 Q Are you currently receiving any medical               |   |
| 11 |  |                                    |    | 10 or psychiatric or psychological treatment?             |   |
| 12 |  |                                    |    | 11 A No, I'm not.   |   |
| 13 |  |                                    |    | 12 Q Prior to the filing of the complaint in              |   |
| 14 | 1  | Affidavit of Lisa Michelle Lambert | 54 | 13 your lawsuit, did you have an opportunity to review    |   |
| 15 |  |                                    |    | 14 the statements of fact contained in it with your       |   |
| 16 |  |                                    |    | 15 lawyer?  |   |
| 17 |  |                                    |    | 16 A Yes.   |   |
| 18 |  |                                    |    | 17 Q And is it your testimony that those                  |   |
| 19 |  |                                    |    | 18 allegations in the complaint are true?                 |   |
| 20 |  |                                    |    | 19 A Yes.   |   |
| 21 |  |                                    |    | 20 Q You have alleged in your complaint                   |   |
| 22 |  |                                    |    | 21 generally that Superintendent William Wolfe has failed |   |
| 23 |  |                                    |    | 22 to carry out his responsibilities as the               |   |
| 24 |  |                                    |    | 23 superintendent with regard to protection of female     |   |
| 25 |  |                                    |    | 24 inmates, including yourself. What's the basis of that  |   |
|    | JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY             |                                    |    | 25 allegation?  |   |
|    | 1-609-890-7033   |                                    |    |   |   |
|    |  |                                    |    | JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY                |   |
|    |  |                                    |    | 1-609-890-7033  |   |
| 1  | LAMBERT  | 4                                  | 1  | LAMBERT   | 6 |
| 2  | LISA MICHELLE  |                                    | 2  | A I don't understand the question.                        |   |
| 3  | LAMBERT, having first been duly                        |                                    | 3  | Q Okay. Let me rephrase.                                  |   |
| 4  | sworn, was examined and testified as                   |                                    | 4  | Your lawsuit suggests that Superintendent Wolfe           |   |
| 5  | follows:   |                                    | 5  | failed to properly supervise the institution as it        |   |
| 6  | EXAMINATION BY   |                                    | 6  | relates to the allegations in your lawsuit.               |   |
| 7  | MR. HALLORAN:  |                                    | 7  | What information do you have that would                   |   |
| 8  |  |                                    | 8  | indicate that Superintendent Wolfe failed to do that      |   |
| 9  | Q Ms. Lambert, would you state your name               |                                    | 9  | as it relates to the allegations that you have made in    |   |
| 10 | for the record.  |                                    | 10 | your lawsuit, particularly as they relate to John Raun    |   |
| 11 | A Lisa Michelle Lambert.                               |                                    | 11 | and James Eicher?   |   |
| 12 | Q Ms. Lambert, I'm Tom Halloran. I'm with              |                                    | 12 | A I feel that he repeatedly disregarded                   |   |
| 13 | the Pennsylvania Attorney General's Office, and I      |                                    | 13 | complaints that I made against the officers. I feel       |   |
| 14 | represent the defendants in a lawsuit that you filed   |                                    | 14 | that he repeatedly took their word and did not listen     |   |
| 15 | in the United States District Court, Western Section   |                                    | 15 | to me because I was an inmate.                            |   |
| 16 | of Pennsylvania, Civil Action No. 96-247 ERIE.         |                                    | 16 | Q Okay. And with regard to Captain                        |   |
| 17 | In that lawsuit you have named Superintendent          |                                    | 17 | Bartlett, you have indicated that you attempted to        |   |
| 18 | William Wolfe, Deputy Superintendent Charles Utz,      |                                    | 18 | institute a claim against him. What's the basis of        |   |
| 19 | Captain Keith Bartlett, John Raun, James Eicher, and   |                                    | 19 | the complaint you have against Captain Bartlett?          |   |
| 20 | Deputy Superintendent Victoria Kormanic as defendants. |                                    | 20 | A I feel that Captain Bartlett repeatedly used            |   |
| 21 | Are you familiar with that lawsuit?                    |                                    | 21 | intimidation to keep me from making complaints against    |   |
| 22 | A Yes.   |                                    | 22 | his fellow officers. I feel he repeatedly disregarded     |   |
| 23 | Q I'm going to ask you some questions about            |                                    | 23 | my complaints. I feel that he used every tactic he        |   |
| 24 | that lawsuit and some of the facts underlying it.      |                                    | 24 | could to keep me quiet.                                   |   |
| 25 | And if you don't understand my question, ask me        |                                    | 25 | Q To the best of your knowledge, did                      |   |
|    | JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY             |                                    |    | Superintendent Wolfe direct Captain Bartlett to           |   |
|    | 1-609-890-7033   |                                    |    | JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY                |   |
|    |  |                                    |    | 1-609-890-7033  |   |

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| <p><b>LAMBERT</b> 7</p> <p>1 investigate allegations of sexual abuse, as they<br/>2 related to you?</p> <p>3 A I have no knowledge of that. I have never seen<br/>4 Superintendent Wolfe speaking to Captain Bartlett.</p> <p>5 Q Okay. Did Captain Bartlett come to you<br/>6 and ask you questions about your allegations regarding<br/>7 either John Raun or James Eicher?</p> <p>8 A Yes.</p> <p>9 Q You have also named as defendant Deputy<br/>10 Superintendent Victoria Kormanic, and what is the<br/>11 basis of your allegation against Deputy Superintendent<br/>12 Kormanic?</p> <p>13 A I feel she repeatedly disregarded my<br/>14 complaints. I feel that she used humiliation and<br/>15 intimidation when she videotaped me. I feel that she<br/>16 purposely verbally abused me. She ignored my plight.<br/>17 I feel that she took the word of her officers over my<br/>18 word just because they were officers.</p> <p>19 Q Now, you make some specific allegations<br/>20 with regard to Ms. Kormanic as it relates to the<br/>21 videotaping. Do you recall those?</p> <p>22 A Yes.</p> <p>23 Q All right. Are those true allegations?</p> <p>24 A Yes.</p> <p>25 Q Now, in your complaint you indicated you</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>                     | <p><b>LAMBERT</b> 9</p> <p>1 participated in helping Officer Eicher do things to<br/>2 me.</p> <p>3 Q Was that on one occasion?</p> <p>4 A Yes.</p> <p>5 Q And was that in May of 1993?</p> <p>6 A Yes -- no. I think it was March, March 19th.</p> <p>7 Q March 19, 1994?</p> <p>8 A Yes.</p> <p>9 Q With regard to Officer Eicher, you allege<br/>10 ongoing victimization. When was the first incident<br/>11 that you recall with Officer Eicher?</p> <p>12 A He started following me around in October of<br/>13 '93, and that was basically just general sexual<br/>14 harassment. He tried to offer me gifts. He basically<br/>15 followed me around everywhere I went and kept<br/>16 complementing me, kept writing me letters telling me<br/>17 he was in love with me, and that's as far as it went<br/>18 for two months until Christmas Eve. I just<br/>19 basically --</p> <p>20 Q Christmas Eve nineteen ninety --</p> <p>21 A '93, I think. I'm confused about these years<br/>22 because it's been so long.</p> <p>23 Q And so from October 1993 to December 1993<br/>24 you perceived him following you around and he offered<br/>25 you gifts. What gifts did he offer you?</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>                             |
| <p><b>LAMBERT</b> 8</p> <p>1 arrived at SCI Cambridge Springs, two words, in<br/>2 January 1993, and then in May 1993 through October<br/>3 1994 you allege that Officer Raun, R-a-u-n, kissed and<br/>4 fondled you against your will in the prison, and did<br/>5 so several times.</p> <p>6 When was the last incident between you and<br/>7 Officer Raun that you're complaining about?</p> <p>8 A On October 4th or 5th.</p> <p>9 Q October 4th or 5th of 1994?</p> <p>10 A I'm not -- I'm a little confused about the<br/>11 year. That would have been '94.</p> <p>12 Q And did you keep any written records or<br/>13 notes regarding the alleged events between you and<br/>14 Officer Raun?</p> <p>15 A I kept a calendar, which I believe that the<br/>16 attorney in Pennsylvania has in evidence. I turned<br/>17 that over for pretrial evidence for the trial against<br/>18 Officer Raun.</p> <p>19 Q Did that calendar contain indications for<br/>20 both Eicher and Raun or just Raun?</p> <p>21 A It contained notations for numerous people.</p> <p>22 Q Are you making allegations of sexual<br/>23 misconduct against any other officers other than Raun<br/>24 and Eicher?</p> <p>25 A Officer -- no. He was -- Sergeant Merry</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 10</p> <p>1 A Chocolate, perfume, lace panties. I can't<br/>2 remember. He would just try to slip things into my<br/>3 hand. I can't remember everything, it was so many<br/>4 different things. He would try and put things into my<br/>5 hands, and sometimes I would look at them and<br/>6 sometimes I wouldn't and I would just push his hand<br/>7 back and say I wouldn't want it. I didn't take<br/>8 anything from him.</p> <p>9 Q When you came into the institution, were<br/>10 you advised of the rules and regulations of the<br/>11 institution?</p> <p>12 A Yes.</p> <p>13 Q And you were aware that it was a<br/>14 violation of those rules for a staff member or<br/>15 corrections officer to fraternize with inmates?</p> <p>16 A There was nothing about that in the rule book.<br/>17 I don't recall.</p> <p>18 Q Did you understand that it would be<br/>19 improper for an inmate to receive contraband from a<br/>20 staff member?</p> <p>21 A That was never discussed. That was common<br/>22 practice, for male officers to bring things to the<br/>23 women. I had no knowledge it was against the rules.</p> <p>24 Q Did you receive an inmate handbook?</p> <p>25 A Yes.</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> |

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| <p><b>LAMBERT</b></p> <p>1 Q Did you understand that it was your<br/>2 responsibility as an inmate to be familiar with the<br/>3 inmate handbook?</p> <p>4 A Yes.</p> <p>5 Q And did you understand it would be<br/>6 improper conduct for an officer to engage in sexual<br/>7 harassment of an inmate?</p> <p>8 A I don't recall ever seeing that.</p> <p>9 Q I understand you don't recall seeing it.<br/>10 Did you understand that would be improper conduct?<br/>11 Did you understand that would be conduct that you<br/>12 would be expected to report to the administration?</p> <p>13 A Not at Cambridge Springs. I saw that type of<br/>14 thing every day, officers doing that to women.</p> <p>15 Q And what type of sexual misconduct are<br/>16 you alleging against Officer Raun?</p> <p>17 A Officer Raun?</p> <p>18 Q Yes.</p> <p>19 A Basically, I feel that he enjoyed humiliating<br/>20 me, he enjoyed terrorizing me. He knocked me around.<br/>21 I don't believe at all that he even believed that I<br/>22 was a person, that I was a human being. I believe<br/>23 that he just enjoyed hurting me and making me afraid<br/>24 and slapping me and pushing me and just basically<br/>25 making me very afraid of him.</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p><b>LAMBERT</b></p> <p>11 1 to Deputy Utz?</p> <p>2 A Yes.</p> <p>3 Q You said he hadn't physically abused you.<br/>4 He hadn't hit you at that point?</p> <p>5 A No.</p> <p>6 Q After he struck you or pushed you around,<br/>7 did you then make another complaint to anyone in the<br/>8 administration?</p> <p>9 A Yes. I went to Martha Miller.</p> <p>10 Q Okay. And how many times did you go to<br/>11 Martha Miller?</p> <p>12 A One time.</p> <p>13 Q And what did you report to her?</p> <p>14 A I wrote a four-page grievance on Raun. I wrote<br/>15 everything he had done to me -- that he pushed me,<br/>16 that he sought me out while I was cleaning on my<br/>17 isolated detail, that he repeatedly found me in places<br/>18 where there were no staff members or inmates around,<br/>19 that he had knocked me around, that I felt that he was<br/>20 threatening me.</p> <p>21 Q What were the locations or what was the<br/>22 location of the areas he found you where there were no<br/>23 other persons around?</p> <p>24 A There's a building called Louter. There are<br/>25 four floors. The only floors that were occupied were</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   |
| <p><b>LAMBERT</b></p> <p>1 Q So your testimony, as I gather, is that<br/>2 he physically assaulted you, he beat you; is that<br/>3 correct?</p> <p>4 A He pulled me by my hair. He pushed me. He<br/>5 left marks on me.</p> <p>6 Q Did you understand that if a staff person<br/>7 or corrections officer did that to you, that would be<br/>8 something you as an inmate could and should report to<br/>9 the administration?</p> <p>10 A I thought that I could report it.</p> <p>11 Q Did you report it?</p> <p>12 A Yes.</p> <p>13 Q When did you first report it?</p> <p>14 A I went to Deputy Utz, and at that point I had<br/>15 just told him about Raun making advances towards me,<br/>16 because he hadn't started knocking me around yet, and<br/>17 Deputy Utz just basically laughed it off. He said<br/>18 Raun was a healthy young man, and he basically laughed<br/>19 it off.</p> <p>20 Q When you made that first complaint to<br/>21 Officer Utz, Raun had not physically touched you in<br/>22 any way?</p> <p>23 A Yes. He kept putting his thumb across my mouth<br/>24 and backed me into a corner.</p> <p>25 Q Did you report that conduct specifically</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>  | <p><b>LAMBERT</b></p> <p>12 1 Floors One and Two. Floors Three and Four were very<br/>2 damaged from the rioting at the college campus years<br/>3 ago, and my detail was to clean the stairways on all<br/>4 four floors and to clean Louter Three and Four. There<br/>5 was a lot of debris and graffiti, and I was supposed<br/>6 to try and clean it off as much as I could. I was<br/>7 supposed to pick up pieces of wood and glass and get<br/>8 them picked up.</p> <p>9 Q Who was on that detail with you?</p> <p>10 A I was by myself.</p> <p>11 Q Who assigned you to that detail?</p> <p>12 A Deborah Sauers.</p> <p>13 Q And when did you have that<br/>14 responsibility?</p> <p>15 A From January of '93 until October of '93<br/>16 when -- I'm trying to think. They put me in the<br/>17 laundry in October and November of '93, and then I was<br/>18 in the laundry for a while, and then they put me back<br/>19 on the detail.</p> <p>20 Q Do you recall when you went back on the<br/>21 detail?</p> <p>22 A I think April or May of '94, when I came out of<br/>23 RHU.</p> <p>24 Q And when you went back on the detail the<br/>25 second time, was it Ms. Sauers that put you on the</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> |

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| <p><b>LAMBERT</b> 15</p> <p>1 detail the second time?</p> <p>2 A I don't know. I was told by the</p> <p>3 administration, by Superintendent Wolfe, that he was</p> <p>4 taking my job away from me and putting me back on the</p> <p>5 detail.</p> <p>6 Q You mean your laundry job?</p> <p>7 A No. First they had me on the detail, then I</p> <p>8 was in the laundry, and then they moved me from the</p> <p>9 laundry to the -- I was -- I can't remember what they</p> <p>10 called it. I had a desk in the property office. I</p> <p>11 processed incoming/outgoing packages, and I worked in</p> <p>12 the office with Ms. Lazenby for quite a while. I used</p> <p>13 to file things for her and type things, and I think I</p> <p>14 worked in there for about six weeks, and then I went</p> <p>15 to RHU.</p> <p>16 Q And when was your last day at SCI</p> <p>17 Cambridge Springs?</p> <p>18 A June 27th.</p> <p>19 Q Nineteen ninety --</p> <p>20 A '95.</p> <p>21 Q So what were your assignments? You got</p> <p>22 out of the RHU unit in approximately April 1994?</p> <p>23 A April or May.</p> <p>24 Q And your assignment when you got out</p> <p>25 initially was still with Ms. Lazenby?</p>  | <p><b>LAMBERT</b> 17</p> <p>1 Q What officers assigned you to go upstairs</p> <p>2 and work on Louter Three?</p> <p>3 A Oh, my gosh. I don't remember. It was just</p> <p>4 the unit -- whoever was working in the unit. It was</p> <p>5 just like an offhand thing. They would just tell me</p> <p>6 go up and work for a couple hours.</p> <p>7 Q And did you ever go up to Louter Three</p> <p>8 without being directed to do so or without that being</p> <p>9 part of your job responsibility?</p> <p>10 A Sometimes I would go up there to get a broom</p> <p>11 and a dustpan if I couldn't find one. There were a</p> <p>12 lot of times people would take things up there. There</p> <p>13 would be things that were left up there. Sometimes we</p> <p>14 couldn't find the mop buckets and things, and it</p> <p>15 turned out maintenance supervisors would have taken</p> <p>16 them upstairs and I would have to go upstairs and get</p> <p>17 them.</p> <p>18 Q And did that happen from the first time</p> <p>19 you began to work on Louter Three or did that happen</p> <p>20 after you got out of the RHU and were working on</p> <p>21 Louter Two?</p> <p>22 A That happened all the time. That was a</p> <p>23 constant thing. I couldn't find the proper equipment</p> <p>24 to clean the unit, and I had to go upstairs and get</p> <p>25 it.</p> |
| <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</p> <p>1-609-890-7033</p> <p><b>LAMBERT</b> 16</p> <p>1 A No. They told me Superintendent Wolfe -- I was</p> <p>2 released from the RHU on a Monday. He came and told</p> <p>3 me the Friday before that he would release me on</p> <p>4 Monday before five o'clock, that he was taking my</p> <p>5 property job away from me, and that he was putting me</p> <p>6 back on cleaning detail.</p> <p>7 Q And when you were back on cleaning</p> <p>8 detail, what were your responsibilities?</p> <p>9 A At that point it was to clean Louter Two. That</p> <p>10 was where my room was. I had to clean all the</p> <p>11 bathrooms, the hallways, the bathrooms. Basically, I</p> <p>12 was responsible for the upkeep of the entire unit</p> <p>13 where the women lived.</p> <p>14 And then also when I had extra time, when I had</p> <p>15 my major responsibility done, I was sent upstairs to</p> <p>16 do things like wash screens on the windows, sweep, try</p> <p>17 to get a lot of the debris off the floor.</p> <p>18 Q And who determined when you had your</p> <p>19 Louter Two responsibility completed and then sent you</p> <p>20 to Louter Three?</p> <p>21 A It depended on the officer. If they felt</p> <p>22 that -- if it was a nice officer and they felt that I</p> <p>23 had worked enough, they would just let me go for the</p> <p>24 day, but some officers would say, well, go upstairs</p> <p>25 and work for a couple hours.</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</p> <p>1-609-890-7033</p> | <p><b>LAMBERT</b> 18</p> <p>1 Q Now, you make a number of allegations</p> <p>2 against Officer Raun, beginning, as you indicate, in</p> <p>3 May of 1993, and continuing till October 1994. That</p> <p>4 was the last incident you're making an allegation</p> <p>5 about, is October of 1994?</p> <p>6 A Yes.</p> <p>7 Q Could you tell me when was the first</p> <p>8 incident that you recall with Officer Raun?</p> <p>9 A The first time that he became angry with me was</p> <p>10 right after I had gone to Deputy Utz.</p> <p>11 Q I understand that's the first time he</p> <p>12 became angry with you. What's the first time that you</p> <p>13 and Officer Raun had sexual contact or inappropriate</p> <p>14 touching contact?</p> <p>15 A It was that day.</p> <p>16 Q In May of 1993?</p> <p>17 A Well, actually, I consider what he did, putting</p> <p>18 his thumb across my lip and cornering me and hugging</p> <p>19 me, I consider that inappropriate.</p> <p>20 Q When did that happen?</p> <p>21 A That was happening before. That's why I went</p> <p>22 to Deputy Utz.</p> <p>23 Q When you reported that to Deputy Utz, did</p> <p>24 you report anything else to him in that period of</p> <p>25 time?</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</p> <p>1-609-890-7033</p>  |

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| <p><b>LAMBERT</b></p> <p>1 A I just told him about him cornering me and<br/>2 hugging me and touching my lip with his thumb.<br/>3 Q Was that the extent of the inappropriate<br/>4 touching that you were complaining about with regard<br/>5 to Officer Raun up until May of '93?<br/>6 A Yes.<br/>7 Q So when you went to Deputy Utz, it was<br/>8 sometime after May of 1993, and that's when you<br/>9 complained about his brushing against you and touching<br/>10 your lips with his thumb?<br/>11 A That was in May, and I went to Deputy Utz, and<br/>12 then --<br/>13 Q Go ahead.<br/>14 A -- the next day Captain Lazenby called me into<br/>15 his office and asked me about it, and I told him<br/>16 again, and he basically intimidated me and told me<br/>17 that I'd better not get Raun in trouble.<br/>18 Q And who was present at that meeting with<br/>19 Captain Lazenby?<br/>20 A That was -- that time it was by himself. He<br/>21 called me into his office, and I only told him what<br/>22 happened with Raun because I believed he was asking<br/>23 out of concern for my welfare. I didn't realize he<br/>24 was a friend of Raun's and that he was asking because<br/>25 he wanted to know how much I would say to somebody.</p>   | 19 | <p><b>LAMBERT</b></p> <p>1 walking, but he had me by my hair, and I kept tripping<br/>2 on the stairs. He pulled me up there and he had me by<br/>3 my hair, and he flung me really hard into the wall,<br/>4 and he hurt my mouth really bad. He bruised me and he<br/>5 kept ramming himself into me and smashing me into the<br/>6 wall.<br/>7 Q Now, when you say "stairs," which stairs<br/>8 are we talking about?<br/>9 A He dragged me upstairs to Louter Four.<br/>10 Q This is from Louter Three to Louter Four?<br/>11 A No. I was in the stairway. I don't know what<br/>12 landing I was on. The landings aren't marked.<br/>13 They're just landings and stairs and stairs and<br/>14 stairs.<br/>15 Q And did you, when you met with Martha<br/>16 Miller, did you report to her Raun's actions toward<br/>17 you?<br/>18 A I told her everything that had happened up to<br/>19 that point.<br/>20 Q And that included him rubbing his thumb<br/>21 on your lips? Was he pulling your hair at that point?<br/>22 A By the time I had gone to Martha Miller, he<br/>23 pulled my hair. He also had been grinding himself<br/>24 against me. He bruised my mouth really bad. I had --<br/>25 he had left marks on me that was teeth, and he had</p>   | 21 |
| <p><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> <p><b>LAMBERT</b></p> <p>1 Q Okay. And then as it relates to Officer<br/>2 Raun, what were the next events that occurred with<br/>3 him?<br/>4 A He basically started getting very -- I don't<br/>5 know what you would call it. He started staring at<br/>6 me. He became very menacing after that time.<br/>7 Q Now, the menacing that you're describing,<br/>8 that was based upon him staring at you?<br/>9 A Staring at me, following me around. He kept<br/>10 grabbing me by my hair. He kept pushing himself into<br/>11 me.<br/>12 Q This is after you have complained to<br/>13 Deputy Utz?<br/>14 A Yes.<br/>15 Q And when he was doing this, over what<br/>16 period of time are we talking about? I know we're<br/>17 into May 1993. Was it a month? two months?<br/>18 A No. It was constant. It went on and on and on<br/>19 and on every time he was there.<br/>20 Q At some point I think you allege that he<br/>21 sadistically beat you several times. When was the<br/>22 first time that you allege he sadistically beat you?<br/>23 A After I went to Martha Miller and I told her I<br/>24 thought Raun was going to try and rape me. He dragged<br/>25 me up the stairs, basically by my hair. I was</p> | 20 | <p><b>LAMBERT</b></p> <p>1 smashed me, like rammed me into the wall.<br/>2 Q So you told Ms. Miller all that?<br/>3 A Yes.<br/>4 Q And then after he grabbed you on the<br/>5 stairwell, did you then go back to any staff member?<br/>6 A No, not after what happened with Martha Miller.<br/>7 I was petrified. I eventually went to Sandra<br/>8 Wolfgang, but after that -- I had already gone to<br/>9 Deputy Utz. Raun had reacted very badly to that.<br/>10 Then I had gone to Martha Miller. He flipped out and<br/>11 went into a rage over that, and I was terrified to try<br/>12 and go to anybody else.<br/>13 Q Do you understand it was a violation of<br/>14 the rules to pass notes to officers and receive notes<br/>15 from officers?<br/>16 A No, not at Cambridge Springs. I saw people get<br/>17 handed notes all the time.<br/>18 Q Do you recall that you were called in for<br/>19 possible discipline regarding a note you attempted to<br/>20 pass to Officer Raun?<br/>21 A They -- I think Captain Lazenby called me in<br/>22 and asked me about a note, because I gave a note to a<br/>23 girl to give to a girl that worked in dietary, and<br/>24 somehow Raun confiscated it or got hold of it somehow,<br/>25 and Captain Lazenby asked me who the note was for, and</p> | 22 |

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| <p><b>LAMBERT</b></p> <p>1 I told him a girl in dietary, and he told me I<br/>2 shouldn't be passing notes to other inmates, and that<br/>3 was pretty much the end of it.</p> <p>4 Q Was that the same meeting that you<br/>5 referred to before with Captain Lazenby?</p> <p>6 A No.</p> <p>7 Q This is a different meeting?</p> <p>8 A Yes.</p> <p>9 Q And did Captain Lazenby tell you it was<br/>10 inappropriate for you to be passing notes to other<br/>11 inmates or staff members?</p> <p>12 A He said I shouldn't pass notes to other<br/>13 inmates. He said it wasn't specifically against the<br/>14 rules, but he told me it wasn't a good idea, and he<br/>15 said that he just wanted to clarify who the note was<br/>16 to.</p> <p>17 Q And was anyone else present at that<br/>18 meeting with Captain Lazenby?</p> <p>19 A No.</p> <p>20 Q When were you called in by Captain<br/>21 Lazenby regarding that note?</p> <p>22 A Maybe April or May or June of '93. I don't<br/>23 remember. It was sometime in the summer.</p> <p>24 Q Okay. Was it before or after the time<br/>25 that you allege that Raun first grabbed you by the</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>  | <p>23</p> | <p><b>LAMBERT</b></p> <p>1 door, or he would just say something to me like you'd<br/>2 better keep your mouth shut, or just something<br/>3 offhanded and he would keep on walking.</p> <p>4 And then the second time I was in the RHU, I<br/>5 don't remember him coming in the second time, but<br/>6 Eicher came in.</p> <p>7 Q And Eicher didn't come in the first time?</p> <p>8 A No. He didn't work there then, Eicher didn't.<br/>9 I didn't know him then.</p> <p>10 Q Okay. And when you got out of the RHU<br/>11 the first time, what allegations are you making with<br/>12 regard to Officer Raun? That would be, I guess, in<br/>13 June of '94.</p> <p>14 A When I got out, he -- basically, things just<br/>15 started up as usual. He started staring at me again.<br/>16 He started grabbing me by my hair. He just started<br/>17 being typically nasty to me again, following me<br/>18 around, yelling at me.</p> <p>19 One time when I was in the cafeteria with a<br/>20 table full of people, he was staring at us and then he<br/>21 just screamed at us to get out. He just basically did<br/>22 things that were menacing and threatening and<br/>23 intimidating in nature.</p> <p>24 Q Did he ever have any inappropriate sexual<br/>25 activities with you from January of '94 to October of</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p>25</p> |
| <p><b>LAMBERT</b></p> <p>1 hair and dragged you upstairs to Louter Hall?</p> <p>2 A I don't remember.</p> <p>3 Q Now, you were in the RHU for some period<br/>4 of time in '94?</p> <p>5 A Yes. Two different times.</p> <p>6 Q Okay. Do you recall the times you were<br/>7 in the RHU?</p> <p>8 A The first time was, I think, March of '94, till<br/>9 April or May or June of '94. There was a two- or<br/>10 three-month period the first time.</p> <p>11 And then the second time, I believe, was from<br/>12 October 10th or sometime around there until -- that<br/>13 was in '94 -- until June 27th of '95.</p> <p>14 Q Okay. Are you making any allegations<br/>15 against Officer Raun or Officer Eicher for that period<br/>16 of time that you were in RHU?</p> <p>17 A They both at different times came back and they<br/>18 said ignorant things to me, but nothing. They were<br/>19 not able to physically have access to me because there<br/>20 was a steel door there.</p> <p>21 Q And do you recall whether those events<br/>22 happened during the first time you were in the RHU or<br/>23 the second time you were in the RHU?</p> <p>24 A The first time I was in the RHU, Raun would<br/>25 come in there and he would just look at me through the</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p>24</p> | <p><b>LAMBERT</b></p> <p>1 '94?</p> <p>2 A Yes. He periodically, repeatedly, would grab<br/>3 me whenever he found me in deserted areas of Louter.</p> <p>4 Q Let's go back. Did these incidents occur<br/>5 anywhere other than Louter Hall?</p> <p>6 A I don't remember. I believe that they all<br/>7 pretty much happened in Louter because that's always<br/>8 where I was.</p> <p>9 Q And you made some allegations regarding<br/>10 the stairwell at Louter Hall. Is that where most of<br/>11 these incidents were occurring?</p> <p>12 A Yes. Usually there's only one stairway. At<br/>13 that time only part of Louter One was used, and there<br/>14 is one stairway that inmates and staff have access to.<br/>15 There are four other stairways. There is one stairway<br/>16 to the left part of the building that's totally<br/>17 deserted, and the main stairway is the second one.<br/>18 The third and fourth stairways at the other parts of<br/>19 the building are totally deserted and nobody uses<br/>20 them. Inmates and officers are not supposed to have<br/>21 access to them.</p> <p>22 Q Are they kept locked?</p> <p>23 A Sometimes they are; sometimes they're not.</p> <p>24 Q All right. Now, you recall the first<br/>25 event after you were released from the RHU as being a</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>         | <p>26</p> |

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| <p><b>LAMBERT</b> 27</p> <p>1 time when he pulled your hair in Louter Hall. Was<br/>2 that in the stairway?</p> <p>3 A I'm not sure right when I got out of RHU. I'm<br/>4 not -- it's hard to remember. It was five years ago.<br/>5 I just know that things started right back up.</p> <p>6 Q Okay. And when you got out and things<br/>7 started back up again, did you then make a complaint<br/>8 to anyone in the administration?</p> <p>9 A I started going to Ms. Wolfgang, to Sandra<br/>10 Wolfgang.</p> <p>11 Q Do you recall the first time you went to<br/>12 Ms. Wolfgang?</p> <p>13 A I believe in July or August of '94.</p> <p>14 Q And when you first went to Ms. Wolfgang,<br/>15 did you report conduct involving Officer Raun?</p> <p>16 A Yes. Officer Raun and Officer Eicher.</p> <p>17 Q In the complaint you indicate, I believe,<br/>18 that the time period before the events with Officer<br/>19 Eicher were between August of '94 and October of '94.<br/>20 Does that mean when you first went to Ms. Wolfgang it<br/>21 was after you were having trouble with Officer Eicher<br/>22 also?</p> <p>23 A Yes. I began having trouble with him<br/>24 because -- well, actually, October of '93 things<br/>25 really started to get bad. Christmas Eve, that was</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 29</p> <p>1 said something ignorant to me one time about that he<br/>2 had gotten -- and I can't remember what the word is.<br/>3 He said something about he had gotten an operation so<br/>4 he couldn't have children anymore, and he said the<br/>5 name of it. I can't remember what it's called. And<br/>6 he said now you don't have to worry about getting<br/>7 pregnant, and he kept on walking.</p> <p>8 Q That happened while you were in the RHU?</p> <p>9 A Yes.</p> <p>10 Q And when you were released from the RHU<br/>11 the second time, okay, I think you indicated you<br/>12 left -- when did you indicate you left Cambridge<br/>13 Springs?</p> <p>14 A June 27th.</p> <p>15 Q '95?</p> <p>16 A Yes.</p> <p>17 Q How much time was it between the time<br/>18 that you got out of the RHU the second time and you<br/>19 were transferred to another institution, or were you<br/>20 transferred from the RHU?</p> <p>21 A I was taken from the RHU. I was put in a<br/>22 transport jumpsuit. I was handcuffed behind my back<br/>23 and I was turned over to central transport. They<br/>24 videotaped me leaving the institution, and I was given<br/>25 directly to central transport. And then I was with</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   |
| <p><b>LAMBERT</b> 28</p> <p>1 the first time he told me -- he said I haven't hurt<br/>2 you yet, but I could, and that was when things started<br/>3 to get out of line with him.</p> <p>4 Q That was before you were put in the RHU?</p> <p>5 A Yes.</p> <p>6 Q All right. At some point after you got<br/>7 out of the RHU, you went to Ms. Wolfgang and you<br/>8 reported an incident involving Officer Raun and<br/>9 Officer Eicher; is that correct?</p> <p>10 A Yes.</p> <p>11 Q And you don't recall exactly when that<br/>12 was, but it was sometime after you got out of the RHU?</p> <p>13 A Right.</p> <p>14 Q And then you were telling me that you<br/>15 were placed in the RHU a second time?</p> <p>16 A Yes.</p> <p>17 Q And that was approximately when?</p> <p>18 A October of '94.</p> <p>19 Q Okay. And that from October of '94 you<br/>20 didn't have any problems with either -- well, you had<br/>21 no problems at all with Officer Raun, and the only<br/>22 problem you had with Officer Eicher, he would<br/>23 occasionally walk by in the RHU?</p> <p>24 A Yes. And he would come outside my window on<br/>25 third shift, I guess to do building checks, and he</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>  | <p><b>LAMBERT</b> 30</p> <p>1 them for about a week and a half, driving all over who<br/>2 knows where, and then they finally delivered me to<br/>3 Delaware, to WCI, Women's Correctional Institution, in<br/>4 Delaware.</p> <p>5 Q So other than the verbal comment from<br/>6 Officer Eicher when you were in the RHU the second<br/>7 time, there were no other contacts with him, and no<br/>8 contacts at all with Officer Raun after October 1994?</p> <p>9 A Eicher came in a couple times and said<br/>10 something smart to me, and they were just basically<br/>11 vulgar comments.</p> <p>12 And then I saw him twice when I went out to the<br/>13 yard they have. It's not a yard there. Basically<br/>14 they lock like a dog pound, and they put you out there<br/>15 so you could get fresh air. They put you out there<br/>16 for an hour or two.</p> <p>17 And twice when I went out there, he was the<br/>18 officer out there, so I stopped going out there for a<br/>19 while. I told the officers I didn't want to go out.<br/>20 But twice when I was out there, I was out there with<br/>21 him, and I think there might have been another inmate<br/>22 present, and it just made me feel really disgusting<br/>23 and uncomfortable.</p> <p>24 Q Did anything happen?</p> <p>25 A No. There was another inmate there. I just</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> |

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| <p><b>LAMBERT</b></p> <p>1 remember there was somebody else there that he<br/>2 couldn't say anything. He just looked at me and I<br/>3 felt really uncomfortable.</p> <p>4 The dog pounds there, they have chains, and<br/>5 there was two layers of fence between he and I, so<br/>6 there was no way that anything could have happened.</p> <p>7 Q So he's not inside the fence anyway; he's<br/>8 outside?</p> <p>9 A No. The dog pounds are like this, and then<br/>10 there's the fence where the door closes, and then<br/>11 there's another fence in front of that, so you're<br/>12 basically behind two layers of fencing.</p> <p>13 Q Okay. I want to go back to the period of<br/>14 time when you were released from RHU the first time<br/>15 before you went in the second time, and I want to ask<br/>16 you a few more questions about Officer Raun.</p> <p>17 You indicated that at some point you did<br/>18 complain to Ms. Wolfgang about Officer Raun, and when<br/>19 was the next event that you can recall with Officer<br/>20 Raun after you complained to Ms. Wolfgang?</p> <p>21 A I don't think he found out about that, that I<br/>22 told her. I'm sure he knows now, but I don't think at<br/>23 that point he found out about that because he didn't<br/>24 say anything to me about it the next time, and he kept<br/>25 doing things, like pulling my hair. And he would just</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p><b>LAMBERT</b></p> <p>1 times a week.</p> <p>2 Q Now, you're saying on many of those<br/>3 occasions he grabbed your arms?</p> <p>4 A That's how he would hold me. Sometimes he<br/>5 would grab me here. When he had me against the wall,<br/>6 he would put his hands and push my shoulder back.</p> <p>7 Q And did that conduct cause bruising on<br/>8 your body?</p> <p>9 A Yes.</p> <p>10 Q And that happened, would you say, at<br/>11 least once a week?</p> <p>12 A More than once a week.</p> <p>13 Q More than once a week?</p> <p>14 A Yes. It was bad enough to the point that I<br/>15 basically had to schedule my visits around when I<br/>16 didn't have marks on me. I would call my parents and<br/>17 say you can come tomorrow, because I knew if the<br/>18 officer saw it, that they would call the<br/>19 administration, and Raun would get in trouble and it<br/>20 would be a lot worse.</p> <p>21 Q How many times, from June through October<br/>22 1994, did you seek medical attention for those<br/>23 bruises?</p> <p>24 A None. The doctor saw me one time, and that was<br/>25 in October when Ms. Wolfgang saw the bruises and she</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> |
| <p><b>LAMBERT</b></p> <p>1 grab me, I think just to let me know that he could do<br/>2 it.</p> <p>3 But the next time that was really bad was in<br/>4 October when he rammed his knee into me in the<br/>5 stairway. That was the time that he really, really<br/>6 hurt me. I had big marks on me and my leg hurt really<br/>7 bad.</p> <p>8 Q That was one time in October of 1994?</p> <p>9 A Yes.</p> <p>10 Q And were there any times prior to that<br/>11 where he beat you to the point where you felt the same<br/>12 kind of pain you say you did in October of '94?</p> <p>13 A Yes. When he would ram me into the wall and he<br/>14 would grind himself into me, he would leave bruises on<br/>15 me, on my legs and down across my pubic bone and on my<br/>16 lower stomach, and he would like squeeze me really<br/>17 hard here and pull my hair, and like I had bruises on<br/>18 my mouth from his teeth.</p> <p>19 Q How many times did that conduct occur<br/>20 between June of '94 and October of '94?</p> <p>21 A I don't know. Every chance he got, every<br/>22 chance where he found me alone or where he ran into me<br/>23 at work.</p> <p>24 Q Was it once a month?</p> <p>25 A No. It was far more than that. It was several</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   | <p><b>LAMBERT</b></p> <p>1 went and told Deputy Utz and Superintendent Wolfe.</p> <p>2 Q Did you ever receive any notes from<br/>3 Officer Raun?</p> <p>4 A Yes.</p> <p>5 Q Did you keep those notes?</p> <p>6 A No. I tore them up and flushed them down the<br/>7 toilet.</p> <p>8 Q And did you ever send any notes to<br/>9 Officer Raun?</p> <p>10 A No.</p> <p>11 Q The times that you indicated that Officer<br/>12 Raun assaulted you in the stairwell or in areas in<br/>13 Louter Hall, did you ever obtain any articles of his<br/>14 clothing or parts of his uniform?</p> <p>15 A Did I ever what?</p> <p>16 Q Did you ever get possession of any<br/>17 articles of his clothing or his uniform?</p> <p>18 A No.</p> <p>19 Q Did you ever have in your possession his<br/>20 name tag or any parts of his name tag?</p> <p>21 A Did he ever give me his name tag?</p> <p>22 Q Did he ever give it to you or did you<br/>23 ever take it or did you ever have it in your<br/>24 possession, his name tag, or any parts of his name<br/>25 tag?</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   |

| LAMBERT                                    |   | 35   | LAMBERT                                    |  |
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| 1  | A | Absolutely not.  | 1  | things" every night because I had to get Epsom salts   |
| 2  | Q | Did you ever have sexual intercourse with              | 2  | to clean my feet and ointment and all kinds of things, |
| 3  |   | Officer Raun?  | 3  | and this would happen when we went to "creams and      |
| 4  |   | I'm sorry. I didn't hear you. You have to              | 4  | things."   |
| 5  |   | give a verbal response.                                | 5  | Q And Leanne Giaffco would go with you?                |
| 6  | A | No.  | 6  | A Yes.   |
| 7  | Q | Did you ever report that you had sexual                | 7  | Q Was anyone else present?                             |
| 8  |   | intercourse with Officer Raun to anyone?               | 8  | A There might have been, but nobody I                  |
| 9  | A | I said that -- I think I said "sexual contact."        | 9  | specifically recall. That's a big hall. It has         |
| 10   |   | That's -- I'm pretty sure that's the wording I used.   | 10   | basically I guess what you would consider cathedral    |
| 11   |   | I consider that sexual conduct -- I don't know if      | 11   | ceilings, and it's very huge and open. It's just very  |
| 12   |   | other people do, but I consider a man rubbing himself, | 12   | big. There's a lot of space in there.                  |
| 13   |   | even with clothes on, I consider that sexual contact.  | 13   | Q Okay. You allege in your complaint you               |
| 14   | Q | And did you ever have any type of oral                 | 14   | had sexual intercourse with Officer Eicher on three    |
| 15   |   | sexual relationship with Officer Raun?                 | 15   | occasions?   |
| 16   | A | Absolutely not.  | 16   | A No. That he made me have sexual intercourse.         |
| 17   | Q | All right. You indicated that, with                    | 17   | Q What you allege in your complaint --                 |
| 18   |   | regard to Officer Eicher, that in December of '93, I   | 18   | A Excuse me?   |
| 19   |   | believe, he was bringing you gifts or offering you     | 19   | Q Never mind.  |
| 20   |   | gifts, and then you were in the RHJ for a period of    | 20   | Is that accurate, that there were three                |
| 21   |   | time?  | 21   | occasions you had sexual intercourse with Officer      |
| 22   | A | Yes.   | 22   | Eicher?  |
| 23   | Q | And after you came out of the RHU, when                | 23   | A Far more than three occasions.                       |
| 24   |   | was the first incident you recall with Officer Eicher? | 24   | Q Far more than three occasions?                       |
| 25   | A | He started pretty much when I got right out.           | 25   | A Yes.   |
| JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY |   |  | JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY |  |
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| LAMBERT                                    |   | 36   | LAMBERT                                    |  |
| 1  |   | remember he grabbed me and kissed me in front of my    | 1  | Q What was the first occasion?                         |
| 2  |   | friend Leanne.   | 2  | A It was March 19th of 1994.                           |
| 3  | Q | What was Leanne's last name?                           | 3  | Q Didn't you indicate that you were in the             |
| 4  | A | Giaffco. He basically just started fondling            | 4  | RHU in March of '94?                                   |
| 5  |   | me, grabbing me, kissing me.                           | 5  | A It must have been later than that. It must           |
| 6  | Q | Was that in front of Leanne Giaffco, what              | 6  | have been later than March.                            |
| 7  |   | you just described, or just a kiss?                    | 7  | Q And the first time this happened, where              |
| 8  | A | He grabbed me, he grabbed me, like he put his          | 8  | was it?  |
| 9  |   | hand, he grabbed me by the butt and like pulled me     | 9  | A It was in the music room.                            |
| 10   |   | against him and kicked me in front of Leanne, and I    | 10   | Q And was anyone else involved other than              |
| 11   |   | think that happened two or three times.                | 11   | Officer Eicher?  |
| 12   |   | It was when we would go to "creams and things,"        | 12   | A Yes. Sergeant Merry, Jim Merry.                      |
| 13   |   | because I had an operation on my feet because I ran a  | 13   | Q Anyone besides the two of them?                      |
| 14   |   | 26-mile marathon at the prison, and when I was done    | 14   | A No.  |
| 15   |   | running the marathon, my toenails had turned black and | 15   | Q And after this happened, you're alleging,            |
| 16   |   | blue because the nurses sprayed us with water, and the | 16   | I assume, that Officer Eicher forcibly raped you on    |
| 17   |   | water was in my shoes, and my toenails peeled back     | 17   | March 19, 1994?  |
| 18   |   | when I was running.                                    | 18   | A Yes.   |
| 19   |   | And when my toenails came in, they came in             | 19   | Q And that he --                                       |
| 20   |   | under my skin, and I had to go to the doctor. And he   | 20   | MR. LOVE: Excuse me. I think she                       |
| 21   |   | had to go -- he had to cut into my toes, and he had to | 21   | said it might have been later. You said                |
| 22   |   | burn the roots with acid to make the toenails come     | 22   | March, and you said she was in RHU, and                |
| 23   |   | back in properly.                                      | 23   | she said it might have been later.                     |
| 24   |   | And my feet were bandaged, and I think they            | 24   | THE WITNESS: No. The RHU.                              |
| 25   |   | were stitched too, and we had to go to "creams and     | 25   | MR. HALLORAN: The RHU might have                       |
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1                   been later.

2                   THE WITNESS: I think I went to  
3                   the RHU in April. I know it was warm  
4                   out, and I get confused about the months  
5                   when it's warm out.

6                   BY MR. HALLORAN:

7                   Q    Okay. Did you report that particular  
8                   event to anyone at SCI Cambridge Springs?

9                   A    No.

10                  Q    And sexual intercourse occurred on some  
11                  other times also?

12                  A    Yes.

13                  Q    When was the first time that you reported  
14                  those events?

15                  A    I believe to Ms. Wolfgang.

16                  Q    Did you report to her that Officer Eicher  
17                  was raping you in these events?18                  A    I told her that he was making me do things, and  
19                  then I told her what the things were.20                  Q    What did you tell her he was making you  
21                  do?22                  A    I told her that he was making me have sex with  
23                  him, that he was taking my clothes off. And she said

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1                   before you told Ms. Wolfgang?

2                   A    That happened in March. I'm sure that's when  
3                   it happened, because it was my daughter's birthday. I  
4                   had a visit that day, and I remember that very  
5                   clearly.6                   I believe I went to RHU April 7th, now that I  
7                   think about it. I reported it to her in July or  
8                   August.9                   Q    And were you eventually interviewed by a  
10                  representative of the Department of Corrections  
11                  Internal Affairs Section, Michael Wolanin?

12                  A    Michael Wolanin, yes.

13                  Q    And following those interviews, were  
14                  criminal charges filed against Officer Eicher?15                  A    I saw Michael Wolanin several times. We did  
16                  not have a good rapport at first at all. It took him  
17                  several times of coming to see me and then my taking  
18                  or passing a polygraph test for him to actually begin  
19                  to lend credibility to what I was telling him.20                  And then after I gave him the letters that  
21                  Officer Eicher had written to me and he had a  
22                  handwriting analysis done and it proved to be Officer  
23                  Eicher's handwriting, that's when he believed me, and  
24                  that's when he started doing things to get me  
25                  transferred, and that's when he had Officer Eicher

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1                   wait a minute, how can he make you do something. And  
2                   I said you don't understand, Sergeant Merry was in on  
3                   it, Sergeant Merry made me go in there, there's  
4                   nothing I can do about it.5                   And she was really shocked. She didn't  
6                   understand how he could find the time, I guess, when  
7                   she was in there. She didn't understand how something  
8                   like that could happen.9                   And then I told her that Sergeant Merry had  
10                  taken me in there and put me in there and locked the  
11                  door, and then he made me go in there.12                  Q    Was Sergeant Merry involved in any of  
13                  these events other than the first one?14                  A    I think that he stood watch. That's what  
15                  Eicher told me. He would say that Merry was outside  
16                  the door. But I don't know if that was true or not.  
17                  I remember sometimes I would see him like in the  
18                  vicinity of the area before or after something  
19                  happened, but I never knew. That was the only time  
20                  that he physically grabbed me, took me down the  
21                  hallway, shoved me in a room and locked the door.  
22                  That was the only time he was there when I came out.

23                  Q    That was the first time?

24                  A    Yes.

25                  Q    And how long after the first event was it

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1                   charged with crimes.

2                   Q    And when was the first time that Officer  
3                   Eicher started writing these letters to you?

4                   A    It started in October or November.

5                   Q    Of what year? Was this before he started  
6                   off with the gifts?

7                   A    This was October of '93.

8                   Q    And those letters you did keep?

9                   A    No. He would try to give me letters, and I  
10                  would refuse ones he would try to give me, but he  
11                  would give them to people to give to me, or he would  
12                  throw them on my bed and I wouldn't know who they were  
13                  from, because inmates pass letters all the time.14                  And a lot of them I threw out, but then my  
15                  friend Candace told me to start keeping them because I  
16                  told her what was going on, and she told me I'd better  
17                  keep them in case something ever happens, and she told  
18                  me I should have kept the ones from Raun.19                  And then I started keeping like the ones that  
20                  he threw on my bed or the ones he gave to someone else  
21                  to give to me, then I started keeping them.

22                  Q    When did you start keeping the letters?

23                  A    After December, because I told her -- I called  
24                  her and told her about what he had done on Christmas  
25                  Eve, about how he said he didn't hurt me yet but he

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|   |                |  |                |
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| <p><b>LAMBERT</b></p> <p>1 could.</p> <p>2 Q Who was this person you called?</p> <p>3 A Candace Hill.</p> <p>4 Q And is she someone on the outside?</p> <p>5 A She was an inmate, but she had gone home.</p> <p>6 I called her and I told her that, what he said<br/>7 to me, and she told me I'd better start keeping the<br/>8 letters, and she wanted me to send them to her, so<br/>9 that's why I sent some of them to her, and then one or<br/>10 two things I kept in my property.</p> <p>11 Q At this point have you turned over all<br/>12 those letters in your possession to your lawyer?</p> <p>13 A Excuse me?</p> <p>14 Q At this point have you turned over all<br/>15 the letters that you have from Officer Eicher to your<br/>16 attorneys?</p> <p>17 A I'm not sure. I believe so, but there were --<br/>18 I don't know. There could still be things in my<br/>19 things at home. I'm not sure. I had a lot of<br/>20 property.</p> <p>21 Q When I say "your attorney," did you turn<br/>22 those over to Mr. Kracov or Mr. Love?</p> <p>23 A I believe so.</p> <p>24 Q Have you been involved in any other<br/>25 lawsuits, civil lawsuits, other than this one?</p> | 43             | <p><b>LAMBERT</b></p> <p>1 criminal matter, and I'm going to<br/>2 instruct her not to answer.</p> <p>3 MR. HALLORAN: Let me clarify.<br/>4 What I'm asking at this point is simply<br/>5 has she alleged sexual abuse or<br/>6 misconduct by any police officers, and I<br/>7 haven't asked any questions about the<br/>8 nature of it or anything else.</p> <p>9 I'm just trying to find out if the<br/>10 allegations exist and if it is an issue.<br/>11 I believe it may be a matter of record in<br/>12 the criminal case.</p> <p>13 MR. LOVE: It is a matter of<br/>14 record, and we would let the record stand<br/>15 for itself. But, again, it would open a<br/>16 door to an area that I really don't<br/>17 believe we should be getting into, and I<br/>18 wouldn't want to get into it without the<br/>19 consent of her criminal attorney because<br/>20 this is an issue in that matter.</p> <p>21 MR. HALLORAN: I will abide by<br/>22 your instructions, but I'm not accepting<br/>23 the representation.</p> <p>24 MR. LOVE: I understand. The<br/>25 record speaks for itself in the criminal</p> | 45             |
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| <p><b>LAMBERT</b></p> <p>1 A I don't believe so.</p> <p>2 Q Do you know Sylvia Vasquez?</p> <p>3 A I think I've heard that name, but I can't put a<br/>4 face with it.</p> <p>5 Q Have you filed any lawsuits against any<br/>6 other police officers or corrections officers?</p> <p>7 A No.</p> <p>8 Q Have you ever alleged sexual abuse<br/>9 against any other police officers or corrections<br/>10 officers?</p> <p>11 MR. LOVE: I'm going to object as<br/>12 to relevance.</p> <p>13 MR. HALLORAN: Okay.</p> <p>14 MR. LOVE: Give me one minute.</p> <p>15</p> <p>16 (At which time, an off-the-record<br/>17 discussion was held.)</p> <p>18</p> <p>19 MR. LOVE: I'm going to ask her<br/>20 not to answer because this is getting<br/>21 into her ongoing criminal case and I<br/>22 don't feel comfortable allowing her to<br/>23 speak to these issues.</p> <p>24 She has counsel in the criminal<br/>25 matter, and this is at issue in the</p>   | 44             | <p><b>LAMBERT</b></p> <p>1 matter.</p> <p>2</p> <p>3 BY MR. HALLORAN:</p> <p>4</p> <p>5 Q After you left Cambridge Springs, did you<br/>6 make any allegations of sexual abuse against any<br/>7 police officers or corrections officers?</p> <p>8 MR. LOVE: Same objection.</p> <p>9 I will instruct you not to answer.</p> <p>10 MR. HALLORAN: How can that be<br/>11 relevant to her criminal proceeding?</p> <p>12 MR. LOVE: If you're asking if she<br/>13 had any -- if she made allegations<br/>14 something that happened with a police<br/>15 officer after she left Cambridge Springs,<br/>16 we would answer that.</p> <p>17 MR. HALLORAN: That's what I'm<br/>18 asking. I'm talking about the time frame<br/>19 after she left Cambridge Springs.</p> <p>20 MR. LOVE: Do you understand what<br/>21 he's asking? He's asking if you made<br/>22 allegations regarding incidents with<br/>23 police officers that occurred after you<br/>24 left Cambridge Springs, the incidents and<br/>25 the allegations after you left Cambridge</p>  | 46             |

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| <p>LAMBERT</p> <p>1 Springs with any police officers?</p> <p>2 THE WITNESS: My federal hearing</p> <p>3 was after Cambridge Springs.</p> <p>4 MR. LOVE: He's talking about</p> <p>5 incidents that occurred after you left</p> <p>6 Cambridge Springs involving police</p> <p>7 officers. In other words, this is</p> <p>8 nothing to do with the criminal case.</p> <p>9 THE WITNESS: Not involving</p> <p>10 myself. I observed things between other</p> <p>11 people, but not involving myself.</p> <p>12</p> <p>13 BY MR. HALLORAN:</p> <p>14</p> <p>15 Q What did you observe?</p> <p>16 A When I was in WCI in Delaware -- I wrote about</p> <p>17 that in my affidavit -- I observed male officers</p> <p>18 harassing and doing things to female inmates.</p> <p>19 Q And did any of those allegations involve</p> <p>20 complaints by you about the conduct of those</p> <p>21 officers --</p> <p>22 A No.</p> <p>23 Q -- directed toward you?</p> <p>24 A No. I never said anything to anybody about</p> <p>25 what I observed until I wrote my affidavit about the</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p>47</p> <p>LAMBERT</p> <p>1 stating that I was transferred to WCI in</p> <p>2 Delaware because I was an inmate that</p> <p>3 misbehaved and caused a lot of trouble in</p> <p>4 the institution, and my attorneys wanted</p> <p>5 to clarify that I was moved for my</p> <p>6 protection and my safety and because</p> <p>7 things had happened to me there and not</p> <p>8 because I was a behavioral problem.</p> <p>9</p> <p>10 BY MR. HALLORAN:</p> <p>11</p> <p>12 Q And did you prepare that affidavit</p> <p>13 yourself?</p> <p>14 A Yes.</p> <p>15 Q And was that affidavit, to the best of</p> <p>16 your knowledge, a truthful statement of the accounts</p> <p>17 that happened to you at Cambridge Springs?</p> <p>18 A Yes.</p> <p>19 Q And in what case was the affidavit used?</p> <p>20 MR. LOVE: Just, again, my</p> <p>21 objection to discussions is ongoing, or</p> <p>22 my objection to anything regarding the</p> <p>23 criminal matter is ongoing.</p> <p>24 But you can go ahead and answer.</p> <p>25 THE WITNESS: Could you please</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p>48</p> <p>LAMBERT</p> <p>1 things that I saw going on at WCI in Delaware. They</p> <p>2 didn't directly involve me, but it was something that</p> <p>3 frightened me.</p> <p>4 Q This affidavit you prepared, what was it</p> <p>5 prepared for?</p> <p>6 MR. LOVE: Just, again, I'm going</p> <p>7 to make the same objection I made before</p> <p>8 about anything regarding her criminal</p> <p>9 case. I'm going to object to any</p> <p>10 discussions regarding her criminal past</p> <p>11 or her criminal case.</p> <p>12 This matter is still in</p> <p>13 litigation, and we're going to file a</p> <p>14 motion in limine to keep these things out</p> <p>15 of the case, but I will allow her to</p> <p>16 answer.</p> <p>17 Tell him what the affidavit is</p> <p>18 about.</p> <p>19 THE WITNESS: My attorneys,</p> <p>20 Christina Rainville and Peter Greenberg,</p> <p>21 asked me to prepare an affidavit to</p> <p>22 clarify what happened to me at Cambridge</p> <p>23 Springs, because numerous administrative</p> <p>24 staff at Cambridge Springs had made</p> <p>25 defaming comments about me to the press</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p>50</p> <p>LAMBERT</p> <p>1 repeat the question?</p> <p>2</p> <p>3 BY MR. HALLORAN:</p> <p>4</p> <p>5 Q In what litigation was the affidavit</p> <p>6 used?</p> <p>7 A In my petition for a writ of habeas corpus.</p> <p>8 Q Did you authorize your attorneys to put</p> <p>9 that affidavit on the Internet?</p> <p>10 MR. LOVE: Same objection.</p> <p>11 Go ahead and answer, if you know.</p> <p>12 THE WITNESS: I had no idea it was</p> <p>13 on the Internet. I don't know anything</p> <p>14 about that.</p> <p>15</p> <p>16 BY MR. HALLORAN:</p> <p>17</p> <p>18 Q When was the last time that you received</p> <p>19 any psychiatric or psychological counseling at any of</p> <p>20 these institutions? Well, let's start with the Edna</p> <p>21 Mahan facility.</p> <p>22 A I can't hear you.</p> <p>23 Q Have you ever received any psychiatric or</p> <p>24 psychological treatment at this facility, Edna Mahan?</p> <p>25 A I don't believe so.</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> |
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| <p><b>LAMBERT</b> 51</p> <p>1 Q And did you ever receive any psychiatric<br/>2 or psychological counseling at the Delaware facility?<br/>3 A No.<br/>4 Q Was there a period of time when you were<br/>5 not in prison?<br/>6 A Yes.<br/>7 Q When you were out of prison, did you ever<br/>8 receive any psychological or psychiatric counseling,<br/>9 for example?<br/>10 A Yes.<br/>11 Q Who did you receive that from?<br/>12 THE WITNESS: Should I answer<br/>13 that?<br/>14 MR. LOVE: One second. I'm going<br/>15 to again ask her not to answer because I<br/>16 think it may go into some areas about the<br/>17 criminal case.<br/>18 MR. HALLORAN: Off the record for<br/>19 a second.<br/>20 (At which time, an off-the-record<br/>21 discussion was held.)<br/>22 MR. HALLORAN: Back on the record.<br/>23 We're back on the record, and<br/>24 JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>25 1-609-890-7033</p>   | <p><b>LAMBERT</b> 53</p> <p>1 emotional distress and trauma, and<br/>2 plaintiff's counsel has indicated he does<br/>3 not object to a stay of the proceeding<br/>4 until such time as we can obtain access<br/>5 to those records to determine the<br/>6 correlation, to identify whether or not<br/>7 they have any relevance to the action for<br/>8 damages, which it's necessary to arrive<br/>9 at.<br/>10 Is that accurate?<br/>11 MR. LOVE: Well, just add it would<br/>12 be Ms. Rainville that would decide<br/>13 whether or not that material should be<br/>14 released.<br/>15 MR. HALLORAN: Well, I guess what<br/>16 I'm trying to do is remove myself so you<br/>17 and Ms. Rainville can discuss it and<br/>18 decide and let me know what your position<br/>19 is. I think it's a problem with me<br/>20 dealing directly with Ms. Rainville.<br/>21 MR. LOVE: I understand that, yes.<br/>22 MR. HALLORAN: Okay.<br/>23 MR. LOVE: We could always give<br/>24 her a call, if you want, or we can skip<br/>25 over this and do the rest.<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> |
| <p><b>LAMBERT</b> 52</p> <p>1 we're discussing psychiatric and/or<br/>2 psychological counseling Ms. Lambert<br/>3 received during the period she was not<br/>4 incarcerated after she left Cambridge<br/>5 Springs.<br/>6 During that period of time,<br/>7 Ms. Lambert has indicated she did see a<br/>8 psychiatrist.<br/>9 THE WITNESS: Psychiatrist and a<br/>10 psychologist.<br/>11 MR. HALLORAN: And a psychologist.<br/>12 And approximately how many times?<br/>13 Could we get into that?<br/>14 MR. LOVE: I don't know. As for<br/>15 details, as I said, we will admit she had<br/>16 the counseling during that period, but<br/>17 anything beyond that I would have to<br/>18 refer you to the criminal lawyer for<br/>19 details and allow her criminal lawyer to<br/>20 make a decision on what needs to be<br/>21 disclosed and what does not need to be<br/>22 disclosed.<br/>23 MR. HALLORAN: At this point, this<br/>24 is an action for damages in which<br/>25 Ms. Lambert is making a claim regarding<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 54</p> <p>1 MR. HALLORAN: I'm afraid if we<br/>2 get into that, it's going to take us too<br/>3 long.<br/>4 Ms. Lambert, let me show you<br/>5 what's been marked as deposition<br/>6 Exhibit 1.<br/>7 (At which time, an affidavit of<br/>8 Lisa Michelle Lambert was received and<br/>9 marked as Exhibit 1 for identification.)<br/>10 BY MR. HALLORAN:<br/>11<br/>12 Q Earlier you were referring to an<br/>13 affidavit that you prepared for your habeas corpus<br/>14 proceeding.<br/>15 A Yes.<br/>16 Q Is this a true copy of the affidavit that<br/>17 you prepared?<br/>18 A May I read through this, because this is in<br/>19 different form than the affidavit that I wrote? It<br/>20 looks different.<br/>21 Q Sure.<br/>22 MR. LOVE: Was your affidavit<br/>23 handwritten?<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p>   |

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| <p><b>LAMBERT</b> 55</p> <p>1                   THE WITNESS: Yes, but even when<br/>2                   it was typed up, it was larger. This is<br/>3                   condensed.</p> <p>4                   Okay.</p> <p>5</p> <p>6 BY MR. HALLORAN:</p> <p>7</p> <p>8                   Q    That is the affidavit?</p> <p>9 A    Yes.</p> <p>10                  Q    Having had a chance to review it again,<br/>11                  is it your testimony today that these allegations --<br/>12                  these statements by you are true and accurate?</p> <p>13 A    Yes.</p> <p>14                  Q    In your affidavit, in Paragraph 8 you<br/>15                  talk about a meeting with Martha Miller?</p> <p>16 A    Yes.</p> <p>17                  Q    And it's your recollection that this<br/>18                  meeting occurred on the second floor of an abandoned<br/>19                  building?</p> <p>20 A    Yes. It was wherever. I can't remember. I<br/>21                  think it's -- I think it's called Curry. Where<br/>22                  medical is, it's over top of medical. The whole<br/>23                  second floor of the medical building was abandoned,<br/>24                  and it was up there.</p> <p>25                  Q    Okay. And your recollection was the<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p>   | <p><b>LAMBERT</b> 57</p> <p>1</p> <p>2 BY MR. HALLORAN:</p> <p>3</p> <p>4                   Q    And Ms. Sauers did ultimately transfer<br/>5                  you to laundry detail; is that correct?</p> <p>6 A    Yes. After I had been going to her for in<br/>7                  excess of six months.</p> <p>8                   Q    You indicate in Paragraph 14 that<br/>9                  officers were saying you were carrying Raun's baby?</p> <p>10 A    Yes.</p> <p>11                  Q    What officer said that?</p> <p>12 A    All of them up at dietary. They would make<br/>13                  comments. When I would walk by, they would say that<br/>14                  they thought I was pregnant.</p> <p>15                  Q    Could you give me the names of --</p> <p>16 A    I don't remember who. There are usually<br/>17                  anywhere from seven to twelve officers in dietary.<br/>18                  Half of the officers, you don't even know their names.</p> <p>19                  Q    Now, in Paragraph 15 you talk about one<br/>20                  of the meetings with Debbie Sauers. How many meetings<br/>21                  did you have with Debbie Sauers throughout this period<br/>22                  of time?</p> <p>23 A    Several. Because she wouldn't listen to me, I<br/>24                  kept repeatedly asking her.</p> <p>25                  Q    The one meeting referred to in<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p>                         |
| <p><b>LAMBERT</b> 56</p> <p>1 meeting lasted four hours?</p> <p>2 A    Yes.</p> <p>3                  Q    And that you indicated to Ms. Miller that<br/>4                  you felt that Officer Raun was going to rape you?</p> <p>5 A    Yes.</p> <p>6                  Q    And in the course of that meeting, did<br/>7                  any discussion occur about the note that you had been<br/>8                  accused of sending to Officer Raun?</p> <p>9 A    I don't remember. She might have asked me<br/>10                  something. I don't remember. It was a long time ago.</p> <p>11                  Q    And Paragraph 13, you refer to written<br/>12                  request to Debbie Sauers?</p> <p>13 A    Yes.</p> <p>14                  Q    And you indicated that she said to you<br/>15                  that "none of the supervisors or the girls wanted to<br/>16                  work with a killer"?</p> <p>17 A    Yes.</p> <p>18                  Q    That's what she said to you?</p> <p>19 A    Yes.</p> <p>20                  Q    When was the meeting with Debbie Sauers?</p> <p>21 A    I don't remember exactly when it was. I just<br/>22                  know that as soon as I thought of it, I started<br/>23                  thinking of --</p> <p>24                  MR. LOVE: Can we wait until they<br/>25                  go through? I can't hear.</p> <p>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 58</p> <p>1 Paragraph 13 where you say she made the comment about<br/>2 working with a killer, and there's another meeting,<br/>3 apparently in October, where you indicate that you<br/>4 were very upset and you wanted to go to her office,<br/>5 and that's when she told you she was going to put you<br/>6 in the laundry?</p> <p>7 A    That was -- one of the officers called her<br/>8 because I basically was flipping out, and they had<br/>9 never seen me act like that, and I was very<br/>10 hysterical. And Debbie Sauers was marked down as my<br/>11 counselor at that time, and when an inmate has a<br/>12 hysterical problem, the officers are supposed to call<br/>13 a counselor, so that's who they called.</p> <p>14                  Q    And in Paragraph 20 you were talking<br/>15                  again about when Officer Eicher first approached you,<br/>16                  and I just want to be sure I touched this base. When<br/>17                  was the first time that you complained about Officer<br/>18                  Eicher?</p> <p>19 A    To Ms. Wolfgang.</p> <p>20                  Q    And I gather that would have been August<br/>21                  of 1994?</p> <p>22 A    Yes.</p> <p>23                  Q    And when you complained to Ms. Wolfgang,<br/>24                  as it relates to at least Eicher and Raun, you had<br/>25                  complained in the same manner that you set forth in<br/>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> |

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| <p><b>LAMBERT</b> 59</p> <p>1 this affidavit; were these basically the complaints<br/>2 you were making about Eicher and Raun?</p> <p>3 A Yes. I would tell her. It was in a<br/>4 conversation. I didn't write anything down.</p> <p>5 I think I should also clarify that I didn't<br/>6 give her this much detail. I didn't go into -- I just<br/>7 would tell her what was happening. I didn't give her<br/>8 all the details.</p> <p>9 Q You mean about the locations and things<br/>10 like that?</p> <p>11 A No. I would tell her where something happened,<br/>12 and I would say that he pulled my clothes off and he<br/>13 made me do this and things like that, but I didn't go<br/>14 into all the detail about how I felt and exactly what,<br/>15 all of that.</p> <p>16 Q Was Ms. Wolfgang upset when you told her<br/>17 your story?</p> <p>18 A Yes.</p> <p>19 Q Was she crying, too?</p> <p>20 A She was -- she started -- she was very upset,<br/>21 but she got really upset and her eyes got really wet<br/>22 when I pulled my clothes down and showed her the<br/>23 bruises.</p> <p>24 Q So that was in October of 1994?</p> <p>25 A Yes.</p> <p style="text-align: center;">JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 61</p> <p>1 Q He was asking you whether or not you were<br/>2 there to have --</p> <p>3 A He was screaming at me.</p> <p>4 Q And what he screamed was were you there<br/>5 to have a liaison with Corrections Officer Eicher?</p> <p>6 A He said are you F'ing Officer Eicher. He said<br/>7 I know you are, I know how you girls are, I know<br/>8 you're F'ing Officer Eicher.</p> <p>9 Q What was your response?</p> <p>10 A I told him that I don't know what he was<br/>11 talking about, I told him I had nothing to say to him,<br/>12 and I told him I didn't want to talk to him.</p> <p>13 Q Now, the truth was that at that time you<br/>14 and Officer Eicher were having sexual intercourse?</p> <p>15 A I didn't hear you.</p> <p>16 Q At or around that time you and Officer<br/>17 Eicher were having sexual intercourse?</p> <p>18 A We were not having sexual intercourse. He was<br/>19 forcing me to do things.</p> <p>20 Q And among the things he was forcing you<br/>21 to do was sexual intercourse?</p> <p>22 A Yes.</p> <p>23 Q And when Officer Eicher was asking you<br/>24 about that, you denied --</p> <p>25 A I can't hear you.</p> <p style="text-align: center;">JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p>   |
| <p><b>LAMBERT</b> 60</p> <p>1 Q Ms. Lambert, you were in the RHU in April<br/>2 of '94. Regarding your being found in an unauthorized<br/>3 area, the fourth floor of Louter Hall, do you recall<br/>4 that?</p> <p>5 A Yes.</p> <p>6 Q And at that time do you recall what you<br/>7 told the staff people about why you were there or how<br/>8 you were there?</p> <p>9 A Yes.</p> <p>10 Q What did you tell them?</p> <p>11 A I told them that I was dizzy and that I got<br/>12 confused and went up there.</p> <p>13 Q Did you indicate you blacked out?</p> <p>14 A Yes.</p> <p>15 Q And around that time do you recall being<br/>16 interviewed by Captain Bartlett regarding your<br/>17 presence in that area?</p> <p>18 A Yes.</p> <p>19 Q And did he ask you questions about<br/>20 whether or not your presence there had to do with some<br/>21 meeting with Officer Eicher?</p> <p>22 A He didn't ask me. He screamed at me and<br/>23 slammed his fist down on the table. I was scared to<br/>24 death of him -- he was five times the size of me --<br/>25 and I wouldn't tell him anything.</p> <p style="text-align: center;">JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p>   | <p><b>LAMBERT</b> 62</p> <p>1 Q When Officer Eicher asked you about your<br/>2 relationship -- I'm sorry. Strike that.</p> <p>3 When Captain Bartlett asked you about what was<br/>4 going on between you and Officer Eicher, you denied<br/>5 any such conduct?</p> <p>6 A I told him that I didn't want to talk to him,<br/>7 number one, because I was afraid of him, and, number<br/>8 two, when Officer Eicher pulled me down the back<br/>9 stairway and put me into my room that night, he told<br/>10 me I'd better keep my mouth shut or he was going to<br/>11 get me.</p> <p>12 Q And, therefore, you denied --</p> <p>13 A Right.</p> <p>14 Q -- that anything happened?</p> <p>15 A Right.</p> <p>16 Q When you went to Ms. Wolfgang in August<br/>17 of 1994, did you disclose to her the identities of any<br/>18 of the officers that you were complaining about?</p> <p>19 A I can't hear you.</p> <p>20 Q When you went to Ms. Wolfgang in August<br/>21 of '94, did you disclose the identities of any<br/>22 officers that you were complaining about?</p> <p>23 A The first two weeks I talked to her, she had me<br/>24 call them Officer One, Officer Two, Officer Three, in<br/>25 regards to Sergeant Merry, Eicher or Raun. She</p> <p style="text-align: center;">JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY<br/>1-609-890-7033</p> |

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| <p><b>LAMBERT</b> 63</p> <p>1 appeared to not want to be involved. I think the<br/>2 first time she even seemed a little credulous.</p> <p>3 But after about the second week she wanted to<br/>4 know names, times, dates. She -- the more that I told<br/>5 her, she realized it was a sericus situation and she<br/>6 started taking names.</p> <p>7 Q And when did you first disclose to her<br/>8 the names and the dates?</p> <p>9 A Prcbably the end of August or the beginning of<br/>10 September.</p> <p>11 Q And at that point did you understand that<br/>12 she was going to disclose that information to the<br/>13 administration?</p> <p>14 A Absolutely not. She swore up and down to me.<br/>15 She promised. She told me that it was against her<br/>16 ethical obligations to betray my confidentiality. She<br/>17 explained to me about patient/client privilege. She<br/>18 told me that she would never do that to me, and I<br/>19 believed her, and she never did say anything until<br/>20 October. She didn't say anything for two months. She<br/>21 didn't tell anybody.</p> <p>22 Q When she did say something, what was your<br/>23 reaction?</p> <p>24 A I was furious.</p> <p>25 Q You didn't want her to say anything?</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   | <p><b>LAMBERT</b> 65</p> <p>1 And I felt that I should be able to see my daughter<br/>2 and my family as much as I usually did. And then<br/>3 finally they allowed that, they allowed me to have<br/>4 more than one visit a month.</p> <p>5 Q Did they allow you to have one visit a<br/>6 week for up to eight hours?</p> <p>7 A I believe so.</p> <p>8 Q And just so we're clear, you were aware<br/>9 there were two parts of the restricted housing unit,<br/>10 the disciplinary custody section and the<br/>11 administrative custody section?</p> <p>12 A No. It's the same, it's the same. It's<br/>13 just -- there are four or five rooms, and they are<br/>14 exactly the same. You don't get any type of different<br/>15 treatment or anything.</p> <p>16 Q You're saying if you're in disciplinary<br/>17 custody, you're entitled to the same privileges of<br/>18 someone on administrative custody?</p> <p>19 A Well, usually there's a rule from the<br/>20 Department of Corrections that you're supposed to be<br/>21 allowed privileges, but you have to really argue for<br/>22 them.</p> <p>23 The first time I was in the restricted housing<br/>24 unit, I think I was in there for two months, and I was<br/>25 under administrative custody and not disciplinary</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> |
| <p><b>LAMBERT</b> 64</p> <p>1 A No. I was very angry because she knew that I<br/>2 was afraid of going to the hole, and I was in there<br/>3 for three months before that, and I can't even explain<br/>4 what it's like to be in the hole, but it's mentally<br/>5 unbelievable. You lose your mind in there.</p> <p>6 And she knew I was petrified of going in there,<br/>7 and I was very upset with her when they put me in<br/>8 there and they took my clothing from me. I started<br/>9 screaming, and when she came to my door, I was crying,<br/>10 I was screaming, I was yelling at her. I told her she<br/>11 broke her promise.</p> <p>12 Q And when you refer to the "hole," you're<br/>13 referring to the restricted housing unit?</p> <p>14 A Yes.</p> <p>15 Q And when you were in the restricted<br/>16 housing unit, you were extended extra visitation<br/>17 privileges; is that correct?</p> <p>18 A Not the first time I was in there, and not -- I<br/>19 had to write several requests to -- usually when<br/>20 you're in the restricted housing unit, you're only<br/>21 allowed one visit a month, and I wanted my -- I didn't<br/>22 feel that it was fair that I was under the obligations<br/>23 that somebody else in the RHU would be under because I<br/>24 was in there for a different reason. Usually the<br/>25 restricting housing unit is for disciplinary actions.</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p> | <p><b>LAMBERT</b> 66</p> <p>1 custody, and the first month or two I had no special<br/>2 anything.</p> <p>3 Q Well, in fact, when you were first placed<br/>4 in the restricted housing unit, weren't you in<br/>5 disciplinary custody for violating the rules, for<br/>6 being in an unauthorized area?</p> <p>7 A Yes. For two weeks.</p> <p>8 Q And I asked you earlier about the rules<br/>9 in the institution, and you indicated you did receive<br/>10 an inmate handbook. Do you recall that?</p> <p>11 A Yes.</p> <p>12 Q I show you an inmate handbook from the<br/>13 Department of Corrections. Roman Numeral I, "Rules,"<br/>14 No. 3, did you ever see that before?</p> <p>15 A Which one?</p> <p>16 Q Number 3.</p> <p>17 A I saw this before. This applies to inmates,<br/>18 though.</p> <p>19 Q Well, it says any sexual engagement<br/>20 involving another person, doesn't it?</p> <p>21 A That's not what they tell us. They tell us<br/>22 it's inmates. It's called sodomy. You're not allowed<br/>23 to have sex with other inmates.</p> <p>24 Q And the rule I'm referring to is Roman<br/>25 Numeral I, Paragraph 3, which says: "Any sexual</p> <p style="text-align: center;"><b>JOHN F. TRAINOR, INC., TRENTON, NEW JERSEY</b><br/>1-609-890-7033</p>   |

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1 behavior involving another person, whether voluntary  
 2 or involuntary, is prohibited. Any such conduct will  
 3 be treated as misconduct and a violation of law."

4 That's what it says; right?

5 A That's what it says.

6 MR. LOVE: Which one is that  
 7 again?

8 MR. HALLORAN: It's under Roman  
 9 Numeral I, "Rules," and it's No. 3.

10 BY MR. HALLORAN:

11 Q And were you aware that when you had a  
 12 job assignment, that you were not permitted to leave  
 13 the place of work without authorization from the work  
 14 or crew supervisor?

15 A I didn't have a work or crew supervisor.

16 Q Under "Work," No. 7, is that what the  
 17 inmate handbook provided?

18 A Yes, that's what it says.

19 Q All right. And when you were in your  
 20 work assignments, what were they?

21 A Cleaning Louter Hall.

22 Q Who did you report to when you did that?

23 A Whatever officer was working.

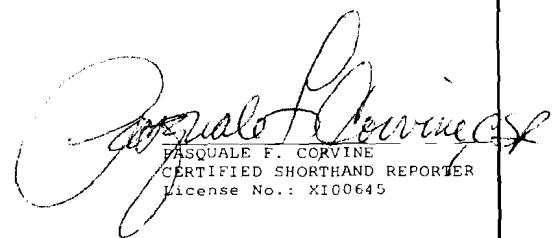
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## C E R T I F I C A T E

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 4 I, PASQUALE F. CORVINE, Certified Shorthand  
 5 Reporter and Notary Public of the State of New Jersey  
 6 do hereby swear that the foregoing is a true and  
 7 accurate record of the testimony taken  
 8 stenographically by me; and I am neither attorney nor  
 9 counsel for nor related to or employed by any of the  
 10 parties to the action in which this matter is taken;  
 11 and further, that I am not a relative or employee of  
 12 any attorney or counsel employed by the parties  
 13 hereto, or financially interested in the action.

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LAMBERT

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1 Q And when you were in the laundry?

2 A Mr. Earl. I don't know his last name.

3 Q Are you aware of the grievance procedure  
 4 at the institution?

5 A Yes. That's why I attempted to grieve Martha  
 6 Miller.

7 MR. HALLORAN: We'll close the  
 8 deposition for now and leave the record  
 9 open for any additional information on  
 10 psychiatric and psychological reports.

11  
 12 (At which time, the witness was  
 13 excused.)

14  
 15 (At which time, the proceeding  
 16 concluded.)

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